

**IN THE UNITED STATES DISTRICT COURT
FOR WESTERN DISTRICT OF PENNSYLVANIA**

DAVID BURKES on behalf of himself and
others similarly situated,

Plaintiff,

v.

CIVIL ACTION NO. 2:22-CV-01054-WSH

ARIAS AGENCIES, and AMERICAN
INCOME LIFE INSURANCE COMPANY

Defendants.

DECLARATION OF DEBRA K. GAMBLE

I, Debra Gamble, declare as follows:


1. I am Senior Vice President of Agency at Defendant American Income Life Insurance Company (“AIL”). I have worked at AIL for more than forty-three years. During my time at AIL, my responsibilities have included, among other things, supervising the onboarding process when prospective or existing independent sales agents apply and contract with the company. I am personally familiar with the records maintained by AIL relating to agent applications and contracts. In preparing this declaration, I have reviewed records and agent files created and maintained by AIL in the usual course of business relating to Plaintiff David Burkes and Opt-in Plaintiffs Toby Painter, Abeni Mayfield, Mikelle Mayfield, Nicholas Atallah, Jennifer Reed, Meredith Carrier, Hunter Renninger, Tyler Szpakowski, Emily Fleming (née Marous), Brendan Gilbert, Christina Quillen, Joseph Lamb, Christopher Gilbert, and Corey Rodriguez (collectively, Plaintiffs). If called as a witness, I could and would competently testify to the facts set forth in this declaration under oath.

2. AIL is an international life insurance company incorporated in Indiana and headquartered in Waco, Texas, where its executives maintain their offices and make company-

wide decisions, including policy and strategy decisions, and otherwise conduct business on behalf of AIL. AIL provides life, accident, and supplemental health insurance products to families and individuals in many states, including Pennsylvania. In the usual course of its business, AIL maintains a file for individuals who apply and contract to sell insurance products with the company, which may include, among other things, agent applications and contracts to sell AIL insurance products.

3. I have reviewed the agent files of Plaintiff David Burkes and Opt-in Plaintiffs Toby Painter, Abeni Mayfield, Mikelle Mayfield, Nicholas Atallah, Jennifer Reed, Meredith Carrier, Hunter Renninger, Tyler Szpakowski, Emily Fleming (née Marous), Brendan Gilbert, Christina Quillen, Joseph Lamb, Christopher Gilbert, and Corey Rodriguez. Based on my review of their respective agent files, each of the foregoing Plaintiffs signed an Agent Contract containing an agreement to submit all disputes with AIL and SGA Simon Arias to binding, individual arbitration.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. This declaration was signed on October 24, 2022 in Waco, Texas.


DEBRA GAMBLE